## IN THE UNITED STATES DISTRICT COURT DISTRICT OF DELAWARE

ZAHARA MOWAFY, NO. 05-733-KAJ Plaintiff JURY TRIAL DEMANDED ٧. NORAMCO OF DELAWARE, INC. and NORAMCO, INC.,

Defendants

## PLAINTIFF'S MOTION TO EXTEND TIME LIMIT FOR SERVICE OF AMENDED COMPLAINT, IN ALTERNATIVE TO ENTRY OF DEFAULT JUDGMENT

Pursuant to Fed. R. Civ. P. 4(m), plaintiff moves this Honorable Court, in the event the Motion for Default Judgment filed March 15, 2006 is denied, to extend the time for service of summons and complaint, for the reasons more fully set forth in the accompanying brief and affidavit.

THE NEUBERGER FIRM, P.A.

MacELREE HARVEY, LTD.

/s/Stephen J. Neuberger Stephen J. Neuberger, Esquire (#4440)Two East Seventh Street, Suite 302 Wilmington, DE 19801-3707 (302) 655-0582 SJN@NeubergerLaw.com Attorney for Plaintiff

/s/William T. Wilson William T. Wilson, Esquire PA Supreme Court I.D.: 41793 17 West Miner Street, P.O. Box 660 West Chester, PA 19381-0660 (610) 436-0100 Attorney for Plaintiff, Admitted Pro Hac Vice

## IN THE UNITED STATES DISTRICT COURT DISTRICT OF DELAWARE

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ZAHARA MOWAFY,	NO. 05-733-KAJ
Plaintiff	JURY TRIAL DEMANDED
v.	
NORAMCO OF DELAWARE, INC. and NORAMCO, INC.,	
Defendants	
ORDER	
AND NOW, this day of	, 2006, upon
consideration of Plaintiff's Motion for Extension of time for Service Under Fed. R. Civ. P.	
4(m) and the Defendant's response thereto, it is hereby ORDERED that the Motion is	
GRANTED. Plaintiff shall serve the summons and complaint within fifteen (15) days of	
this Order.	
	BY THE COURT:

J.

## **CERTIFICATE OF SERVICE**

I, Stephen J. Neuberger, being a member of the bar of this Court do hereby certify that on April 10, 2006, I caused two (2) copies of the foregoing Motion to Extend Time to Serve Amended Complaint to be served on the counsel named below by the means indicated:

Alton A.J. Harmon, Esq. MORGAN, LEWIS & BOCKIUS, LLP 1701 Market Street Philadelphia, PA 19103-2921 (First Class Mail)

THE NEUBERGER FIRM, P.A.

/s/ Stephen J. Neuberger STEPHEN J. NEUBERGER, ESQ. (#4440) Two East Seventh Street, Suite 302 Wilmington, DE 19801-3707 (302) 655-0582 SJN@NeubergerLaw.com Attorney for Plaintiff

Date: April 10, 2006